



DATE: **Updated: April 17th, 2020** (Original: April 3rd, 2020)

Frequently Asked Questions (FAQs)

COVID-19-specific Medicaid Retainer for April 2020

New Information is in Red

Summary:

- Effective March 27, 2020 the Agency of Human Services (hereafter referred to as “the Agency”) is now considering requests for immediate cash flow assistance from health care providers experiencing financial distress due to the COVID-19 pandemic.
- The primary goal of the COVID-19-specific Medicaid Retainer (hereafter referred to as “Medicaid Retainer”) funding is to ensure continued operations through the month of April for eligible Medicaid-enrolled Vermont-based or border provider organizations.
- The Agency is developing a more predictable reimbursement model to address provider cash flow beyond April 2020 and throughout the State of Emergency. More information on post-April 2020 reimbursement will be made available in the coming weeks.

General Questions:

1. How long will the Medicaid Retainer be in place? How long will Vermont Medicaid be accepting applications for Medicaid Retainer funding?

At this time, the Medicaid Retainer is expected to be available for the month of April 2020 only. A longer-term reimbursement model is expected to follow and to continue throughout the duration of the State of Emergency declared by Governor Scott. The first day to apply for Medicaid Retainer funding was March 27th, 2020 and the last day to apply is April 21st, 2020.

2. Which provider types are eligible to apply?

You can find a full list of eligible provider types in the “Provider Organizations Eligible for Retainer” section of the [COVID-19 Specific Medicaid Retainer for April 2020 Announcement](#). If you still have questions about eligibility for Medicaid Retainer funding after visiting this link, please email your questions to AHS.COVID19Financial@vermont.gov.

3. My organization (for example an Adult Day Program) was directed to completely shut down during the State of Emergency and we are not delivering any services at this time. Can we still apply for Retainer funding while we have been directed to remain closed?

Yes. Even if your organization is not currently providing (or billing for) services, you are eligible for consideration so long as you remain a Medicaid-enrolled provider. The intent of the requirement is to ensure sufficient health care services are available to meet the needs of Medicaid members and to support preservation of Medicaid-enrolled providers who may not be able to provide services during the State of the Emergency (e.g. an Adult Day Program).

4. Is there a minimum or maximum amount that may be awarded to an individual applicant?

No, at this time there is no stated minimum or maximum amount of Medicaid Retainer funding that may be awarded to a provider organization; however, requests will be prioritized based upon available funds.

5. Is a Medicaid Retainer payment considered a loan or a grant? Or something else?

Medicaid Retainer payments as currently conceived and implemented are neither grants nor loans. Rather, they are more accurately understood as prospective Medicaid payments that are potentially subject to be reconciled against future Medicaid payments. Whether and to what extent Medicaid Retainer funding is ultimately recouped will depend on a range of variables including fee-for-service claims paid in April, future COVID-19 reimbursement models, utilization trends, and availability of other relief funding, including direct federal aid to providers and federal funding available to the State, among others. The goal of Medicaid Retainer funding is to ensure the near-term financial stability of providers and access to health care services for Vermont Medicaid members. The latest information regarding the Medicaid Retainer and any future COVID-19 funding opportunities will continue to be posted on the [COVID-19 page of the DVHA website](#) as it becomes available.

6. Does the Agency expect that it will fully fund every application it receives?

Applicants may receive all, some or none of the amount requested.

7. How will providers know when the Medicaid Retainer will sunset?

The latest information regarding the Medicaid Retainer and any future COVID-19 funding opportunities will continue to be posted on the [COVID-19 page of the DVHA website](#) as it becomes available. This is the best place to check for up-to-date information.

8. Do I have to pay the Agency back for any Medicaid Retainer funding I receive?

Please see the response to question #5 above. In the event that Medicaid Retainer funding is recouped in the future, the Agency will work with provider organizations to identify processes and timelines for repayment intended to minimize any administrative or financial burdens that repayment may cause.

9. My organization is still delivering some services, but service delivery is below expected levels.

Can I apply for the Medicaid Retainer payment?

Yes, you can apply. Information on expected service volume and practice changes should be included as part of the required documentation submitted with your application. Here is an example of how you can include this information in your application:

“Our office served 50% fewer individuals last month than our monthly average. Specific to Medicaid, we served 75% fewer Medicaid members. We expect to experience a 60% reduction in overall revenue this month and our expected reduction in Medicaid revenue is 65%. Based upon the guidance DVHA provided, we expect to be able to offer some services for Medicaid members through telemedicine, leaving the expected reduction in Medicaid revenue at 50%.”

10. Why is the Medicaid Retainer only in place for the month of April?

As stated in the Summary section on the first page of this document, the Agency is developing a more simplified and predictable reimbursement model to address provider cash flow issues beyond April 2020 and throughout the State of Emergency. The Agency anticipates releasing additional guidance on that reimbursement model within the next two weeks.

11. Why is the application deadline April 21st?

Please reference the Summary section on the first page of this document and the answer to question number 10 above. The Medicaid Retainer is in effect for the month of April. The April 21st deadline will ensure Agency staff have adequate time to review submitted Medicaid Retainer applications and process any awarded Medicaid Retainer payments before the end of the month of April.

12. How was the final amount of the Medicaid Retainer I received calculated?

The funding amount was calculated based on an analysis of several factors including available Medicaid data and the narrative descriptions and documentation within the application indicating the applicant’s provider type, payer mix, financial condition, and COVID-19-related impacts, and may vary from the amount requested. As indicated in the Summary section, funding is intended to ensure continued operations through the month of April.

13. I bill for Medicaid clients under a Licensed Medicaid-enrolled Provider. Would I be eligible to apply for the Medicaid relief funds?

No. Only providers who are enrolled and eligible to bill and receive payments from Medicaid are eligible to apply for the Medicaid Retainer. Non-licensed and/or non-certified healthcare providers that bill under another provider (i.e. supervised billing) are not eligible to apply individually for the Medicaid Retainer. In this case, the Medicaid-enrolled Licensed Provider would be the appropriate provider to submit the application on behalf of the provider entity.

Questions Specific to the Application Process

14. Is there someone who can assist me in completing the application?

Yes. Please send an email to AHS.COVID19Financial@vermont.gov detailing the assistance you need and someone will respond to you as soon as possible.

15. Does a pending application under the federal Paycheck Protection Program affect my application?

In accordance with the “Documentation Required for Retainer Application” section of the [COVID-19 Specific Medicaid Retainer for April 2020 Announcement](#), applicants should list any potential sources of funding currently available and/or potentially available in the next 6-8 weeks. This would include any funding requested through the Paycheck Protection Program supported by the federal Coronavirus Aid, Relief and Economic Security (CARES) Act. A pending application for the federal Paycheck Protection Program does not disqualify your organization from applying to the Vermont Medicaid Retainer funding; however, this information will be viewed as one component of your organization’s overall financial need.

16. If my organization seeks and is awarded a Medicaid Retainer payment, is it still eligible for federal financial relief?

In the absence at this time of any guidance from the U.S. Department of Health and Human Services regarding how it intends to administer the Public Health and Social Services Emergency Fund (PHSSEF), we cannot answer whether or to what extent receipt of Retainer relief may affect eligibility to receive aid from the PHSSEF. Providers are currently encouraged to seek all available avenues of relief funding, including both federal and state offerings. Per the Conditions of Retainer Funding, any providers applying for Medicaid Retainer funds shall also make a good faith effort to apply for federal financial relief available from the PHSSEF under the Coronavirus Aid, Relief, and Economic Security Act. Any potential sources of funding currently available and/or potentially available in the next 6-8 weeks should be included in your Medicaid Retainer funding application. This includes any federal stimulus money you expect to receive.

17. If I receive funding from a federal financial relief program, how will that impact the determination of my Medicaid Retainer funding?

As stated in question #17 above, and the “Documentation Required for Retainer Application” section of the [COVID-19 Specific Medicaid Retainer for April 2020 Announcement](#), applicants should list any other potential sources of funding currently available and potentially available in the next 6-8 weeks. The goal of the Medicaid Retainer is to ensure continued operations through the month of April. Information about other potential funding sources will be considered when reviewing each agency’s unique financial needs to meet this goal.

18. Are bank loans considered to be a potential source of funding?

Bank loans currently available, or potentially available in the next 6-8 weeks, should be reported but will not disqualify you from receiving Medicaid Retainer funding. This information will be considered as one component of your organization’s overall financial need. (Please reference the response to Question 9 above.)

19. Should the application come from individual providers within an organization, or the organization as a whole? If multiple practices operate under a single tax identification number (TIN), should that entity submit a single application for TIN level support?

The Agency would strongly prefer that providers submit a single application to cover the range of financial needs of the entire organization represented under the TIN. If this poses a challenge for your organization, please reach out to AHS.COVID19Financial@vermont.gov and the response team will work with you to find a solution that meets your organization's unique needs.

20. If my organization is awarded Medicaid Retainer funding, how long will it take for me to receive the funds? How will I receive the funds?

Medicaid Retainer funding will be issued in the form of a one-time, lump-sum payment deposited to the financial account where your organization typically receives payments from Vermont Medicaid. Vermont Medicaid payments are made on a weekly basis on Friday of each week. For a Medicaid Retainer payment to be processed in a given weekly payment cycle, the final determination of your application will be made and communicated to you on or before Thursday of the previous week. Please see example scenarios below:

- **Scenario 1:** I receive notification that my application has been approved on April 13th, 14th, 15th or 16th. I should expect to receive my Medicaid Retainer payment on April 24th, 2020.
- **Scenario 2:** I receive notification that my application has been approved on April 17th, 20th, 21st, 22nd or 23rd. I should expect to receive my Medicaid Retainer payment on May 1st, 2020.

21. Should I include information about lost income from other sources, for example other payers, in my application and information about reduced expenses (e.g. furloughing staff)? Will this information be considered when reviewing my application?

Yes. As indicated in the Summary section, Medicaid Retainer funding is intended to ensure continued operations through the month of April, and applicants are encouraged to share as much information as possible about the funding needed to meet this goal. In accordance with the "Documentation Required for Retainer Application" section of the [COVID-19 Specific Medicaid Retainer for April 2020 Announcement](#), applicants should provide as much detail as possible regarding the required information. This includes information on lost income from other payers, for example Medicare and commercial payers, if applicable, and estimated changes in expenses due to COVID-19.

22. May I request a range of funding in my application?

No. Please indicate a single figure representing your organization's financial need, estimated to the best of your ability.